

1 the octane? Is that true?

2 A. Yes, in the late 1970s and early 1980s, they
3 started taking the lead out of gasoline so they
4 increased the aromatic content of gasoline.

5 Q. And there's a chemical called MTBE that has
6 been added to gasoline?

7 A. Yes, which has an even lower odor threshold.

8 Q. And those would change the odor threshold
9 though; wouldn't it?

10 A. It would. I'm not sure -- MTBE wasn't added
11 until later. I'm not aware that it was in this
12 particular product at the Sugar Creek facility.

13 Q. Now, I want to ask you about -- and I'm going
14 to put up here on the board -- I'm looking for
15 exhibits, Exhibit 322. Let's look at
16 Mr. Petty's calculations here. And let me
17 point out something, you're an industrial
18 hygienist and he's an industrial hygienist;
19 right?

20 A. Correct.

21 Q. And he's something that you're not and that is
22 a chemical engineer?

23 A. Yes, he is.

24 Q. He has a chemical engineering degree that you
25 don't hold?

1 A. That's correct.

2 Q. He has more education and training dealing with
3 chemicals, that's what chemical engineering is;
4 right?

5 A. Well, he's a chemical engineer, I'll give him
6 that. I have been -- I don't know that he's
7 been in a single refinery, at least what I
8 recall from his deposition testimony. I have
9 been in many refineries. I worked with the
10 federal government investigating refineries.
11 So I also -- I know chemicals pretty well
12 having worked at the National Institutes of
13 Health in the laboratory in chemistry while I
14 was in college.

15 Q. Let me start first with you talked about 600
16 parts per million years or 600 parts per
17 million concentration of gasoline; right?

18 A. I talked about and 375, 225 these were the
19 average values he used. This was the range
20 that he used from the Drinker study.

21 Q. He never in making his calculations of her
22 ultimate exposure used a range of 600, did he?

23 A. That's not a range. That was the end of the
24 range. He used 375.

25 Q. And 375 was the most he ever used?